

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed
SEP 24 2019
Missouri Ethics
Commission

MISSOURI ETHICS COMMISSION,)	
)	
Petitioner,)	
)	
v.)	
)	Case No. 18-0001-A
COURTNEY CURTIS,)	
)	
and)	
)	
CURTIS FOR MO,)	
)	
Respondents.)	

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

This is the decision and Order of the Missouri Ethics Commission following a hearing on a Complaint filed by Petitioner, by and through counsel, pursuant to Section 105.961, RSMo, and Chapter 536, RSMo. The hearing was conducted before the following members of the Missouri Ethics Commission: Don Summers, Kim Benjamin, Sherman W. Birkes, Jr., Wayne Henke, George Ratermann, and Cheryl D.S. Walker.

The matter arises from an investigation of Respondents, with notice of the investigation being sent electronically and by certified mail on February 2, 2018. The Commission found reasonable grounds of violations of Chapter 130, RSMo on December 7, 2018. A legal complaint was filed by Commission Counsel on January 10, 2019.

The Commission set this matter in a hearing notice dated May 17, 2019, for hearing on June 21, 2019. Respondent Curtis was personally served on June 2, 2019. On June 19, 2019, Respondent Curtis requested a continuance and a pre-hearing conference. Respondent Curtis was notified that the Commission would take up his request for continuance and prehearing conference

on June 21, 2019, at its scheduled meeting. He was informed that he could appear in person or by telephone.

The Commission considered the Respondent's request on June 21, 2019. The Commission was represented by Brian Hamilton. Respondent Curtis did not appear after due notice. The Commission denied Respondent's request and held the closed hearing on June 21, 2019, at the offices of the Missouri Ethics Commission at 3411A Knipp Drive, Jefferson City, Missouri 65109. The Commission took witness testimony and admitted into evidence Petitioner's Exhibits 1 through 9. The Commission voted to leave the evidentiary record open for ninety (90) days to September 20, 2019, to allow Respondent Curtis time to review the transcript and provide a written response to the evidence presented at the June 21, 2019 hearing.

On June 24, 2019, Commission staff informed Respondent Curtis in writing of the Commission's decision to deny his previous request, and to leave the record open so that he could review and respond to the evidence in writing. Respondent Curtis was informed that the Commission would consider his evidence at the first Commission meeting scheduled after September 20, 2019. Commission staff mailed an electronic version of the transcript and evidence to the address where Respondent Curtis was personally served.

Respondent Curtis contacted Commission staff on September 17, 2019 and requested additional time to review and respond to the evidence presented at the June 21, 2019 hearing. Respondent Curtis was again informed that the Commission would consider his request at its September 24 meeting and that if unable to attend in person, he could attend by telephone.

The Commission held another closed proceeding on September 24, 2019, at the offices of the Missouri Ethics Commission at 3411A Knipp Drive, Jefferson City, Missouri 65109. The Commission was represented by Brian Hamilton. Respondent Curtis appeared by telephone.

Respondent Curtis requested additional time to review and respond to the evidence presented at the June 21, 2019 hearing. The Commission denied Respondent Curtis' request for additional time. The Commission admitted into evidence Petitioner's Exhibit 10 which comprised of an affidavit and written correspondence with Respondent Curtis regarding the Commission's rulings described above.

Having considered all the competent and substantial evidence upon the whole record, the Commission finds by a unanimous vote as follows:

FINDINGS OF FACT

1. The Missouri Ethics Commission is an agency of the State of Missouri established pursuant to Section 105.955, RSMo, in part for the purpose of enforcing the provisions of Chapter 130, RSMo.¹

FACTS RELEVANT TO ALL COUNTS

2. Respondent Curtis was a successful candidate for the Missouri House of Representatives, District 73, in the 2012, 2014, and 2016 general elections.

3. Respondent Curtis registered his current candidate committee, Curtis for MO, by filing a Statement of Committee Organization with the Missouri Ethics Commission on January 16, 2014. This Statement of Committee Organization has never been amended.

4. Respondents listed Regions Bank, with an account number ending in *3364, as the official fund depository account on the Statement of Committee Organization. This account was closed on February 13, 2014.

¹ Unless noted otherwise, all statutory references are to the Revised Statutes of Missouri 2000 (Supp. 2018).

5. On January 19, 2016, Respondents opened another account at Regions Bank, with an account number ending in *2990, in the name of “Courtney A. Curtis, Curtis for MO dba.” This account was closed on November 15, 2017. This account was not reported to the Missouri Ethics Commission.

6. Respondent Curtis has a personal account at Regions Bank, with an account number ending in *8623, in the name of “Courtney Curtis.”

COUNT I

Failure to maintain an official fund depository

7. Respondents did not report the closing of the official fund depository account ending in *3364 to the Commission.

8. Respondents did not report the opening or closing of the account ending in *2990 in the name of the committee to the Commission.

Accepting contributions and making expenditures through accounts that were not Respondents' official fund depository account

9. The bank records, and contributions made reported by other committees, showed that Respondents accepted three contributions, totaling \$1,000.00, which were not deposited into the official fund depository account.

Report Name	Contributor Name	Amount	Date
Not Reported	K12 Management Inc.	\$500.00	10/28/16
Not Reported	Safer Families for Missouri	\$250.00	10/28/16
Not Reported	The Saint Louis American Newspaper	\$250.00	11/15/17
Total		\$1,000.00	

10. Respondents made nineteen expenditures, totaling \$569.05, to Hostgator.com for web hosting that were not made from the official fund depository account.

Report Name	Expenditure Name	Amount	Date
Not Reported	Hostgator.com	\$29.95	9/20/16
Not Reported	Hostgator.com	\$29.95	10/20/16
Not Reported	Hostgator.com	\$29.95	11/21/16
Not Reported	Hostgator.com	\$29.95	12/20/16
Not Reported	Hostgator.com	\$29.95	1/20/17
Not Reported	Hostgator.com	\$29.95	2/21/17
Not Reported	Hostgator.com	\$29.95	3/20/17
Not Reported	Hostgator.com	\$29.95	4/20/17
Not Reported	Hostgator.com	\$29.95	5/22/17
Not Reported	Hostgator.com	\$29.95	6/20/17
Not Reported	Hostgator.com	\$29.95	7/20/17
Not Reported	Hostgator.com	\$29.95	8/21/17
Not Reported	Hostgator.com	\$29.95	9/20/17
Not Reported	Hostgator.com	\$29.95	10/20/17
Not Reported	Hostgator.com	\$29.95	11/20/17
Not Reported	Hostgator.com	\$29.95	12/20/17
Not Reported	Hostgator.com	\$29.95	1/22/18
Not Reported	Hostgator.com	\$29.95	2/20/18
Not Reported	Hostgator.com	\$29.95	3/20/18
Total		\$569.05	

COUNT II

Unauthorized use of campaign contributions

11. On October 11, 2017, \$302.45 was transferred from the official fund depository account to a personal account held by Respondent Curtis. The official fund depository account was not reimbursed.

12. Between September 2016 and November 2017, Respondents made thirty-two expenditures, totaling \$7,066.17, which did not appear to be for committee purposes.

Report Name	Expenditure Name	Amount	Date
Not Reported	International Svc Assessment Ginosi Apartels (fee)	\$28.54	9/14/16
Not Reported	Ginosi Apartels	\$951.26	9/14/16
Not Reported	TK Beauty	\$65.46	1/18/17
Not Reported	Riversong Spa	\$149.55	2/3/17
Not Reported	Furniture Factory Outlet	\$491.23	2/6/17
Not Reported	Sling.com	\$39.98	2/14/17
Not Reported	ATM withdrawal	\$404.99	2/21/17

Not Reported	ATM withdrawal	\$204.99	3/3/17
Not Reported	ATM withdrawal	\$204.99	3/6/17
Not Reported	Expedia	\$192.63	3/13/17
Not Reported	Redbox	\$29.09	3/20/17
Not Reported	The Tiger Hotel	\$364.85	4/4/17
Not Reported	The Tiger Hotel	\$497.26	4/4/17
Not Reported	ATT Payment	\$234.54	5/9/17
Not Reported	ATM withdrawal	\$43.50	5/25/17
Not Reported	Mid K Beauty	\$75.92	5/25/17
Not Reported	Westin Kansas	\$541.13	5/30/17
Not Reported	Holiday Inn	\$325.88	6/6/17
Not Reported	ATT Payment	\$217.02	6/8/17
Not Reported	Venmo	\$15.00	7/27/17
Not Reported	ATT Payment	\$322.44	8/8/17
Not Reported	Fox Sports Midwest	\$10.00	8/11/17
Not Reported	Fox Sports Midwest	\$30.00	8/14/17
Not Reported	Hotel Van Zandt	\$484.60	8/29/17
Not Reported	ATT Payment	\$240.66	9/6/17
Not Reported	sq* Loufest, LI	\$6.00	9/11/17
Not Reported	sq* Loufest, LI	\$7.00	9/11/17
Not Reported	sq* Loufest, LI	\$10.00	9/11/17
Not Reported	sq* Loufest, LI	\$7.00	9/11/17
Not Reported	Venmo	\$75.00	9/18/17
Not Reported	ATT Payment	\$235.66	10/6/17
Not Reported	Arbor Village	\$560.00	11/10/17
Total		\$7,066.17	

Using committee funds for expenditures reimbursed by the House of Representatives

13. Between January 2017 and September 2017, Respondents made thirty expenditures totaling \$1,328.91, using committee funds. The expenditures were for gas and hotel rooms on days the legislature was in session, including membership dues paid to the Black Caucus, while also receiving per diem and mileage reimbursements from the Missouri House of Representatives.

COUNT III

Commingling committee fund with funds of others

14. The bank records, and contributions made reported by other committees, showed that Respondents received three contributions, totaling \$1,000.00, which were deposited into Respondent Curtis's personal account.

Report Name	Contributor Name	Amount	Date
Not Reported	K12 Management Inc.	\$500.00	10/28/16
Not Reported	Safer Families for Missouri	\$250.00	10/28/16
Not Reported	The Saint Louis American Newspaper	\$250.00	11/15/17
Total		\$1,000.00	

COUNT IV

Cash contributions and expenditures in excess of limits

15. Respondents made seven cash expenditures, totaling 1,180.00, which exceeded \$50.00 each.

Report Name	Expenditure Name	Amount	Date
Not Reported	ATM withdrawal	\$100.00	1/20/17
Not Reported	ATM withdrawal	\$100.00	2/8/17
Not Reported	ATM withdrawal	\$80.00	2/17/17
Not Reported	ATM withdrawal	\$400.00	2/21/17
Not Reported	ATM withdrawal	\$100.00	3/3/17
Not Reported	ATM withdrawal	\$200.00	3/3/17
Not Reported	ATM withdrawal	\$200.00	3/6/17
Total		\$1,180.00	

COUNT V

Failure to timely and accurately file campaign finance disclosure reports with cumulative information from the date of the last report

16. Respondents failed to timely file four Limited Activity Statements and a 48 Hour Report of Contribution over \$5,000.

Report Name	Year	Due Date	Date Filed
8 Day Before General Election - 11/8/16 - Limited Activity Statement	2016	10/31/16	11/1/16
30 Day After General Election - 11/8/16 - Limited Activity Statement	2016	12/8/16	12/12/16
48 Hour Report of Contribution Over \$5,000	2016	12/9/16	12/12/16
April Quarterly Report - Limited Activity Statement	2017	4/17/17	4/18/17
January Quarterly Report - Limited Activity Statement	2018	1/15/18	1/17/18

17. Respondents filed nine Limited Activity Statements that should have been filed as full disclosure reports because the contributions and/or expenditures exceeded \$500.00 for each reporting period.

Report Name	Year	Start Date	End Date	Due Date
October Quarterly Report - Limited Activity Statement	2016	8/28/16	9/30/16	10/15/16
8 Day Before General Election - 11/8/16 - Limited Activity Statement	2016	10/1/16	10/27/16	10/31/16
30 Day After General Election - 11/8/16 - Limited Activity Statement	2016	10/28/16	12/3/16	12/8/16
April Quarterly Report - Limited Activity Statement	2017	12/4/16	3/31/17	4/17/17
July Quarterly Report - Limited Activity Statement	2017	4/1/17	6/30/17	7/17/17
October Quarterly Report - Limited Activity Statement	2017	7/1/17	9/30/17	10/16/17
January Quarterly Report - Limited Activity Statement	2018	10/1/17	12/31/17	1/15/18
April Quarterly Report - Limited Activity Statement	2018	1/1/18	3/31/18	4/16/18

July Quarterly Report - Limited Activity Statement	2018	4/1/18	6/30/18	7/16/18
--	------	--------	---------	---------

COUNT VI

Failure to report contributions received

18. Respondents failed to report seven contributions of \$100.00 or less, totaling \$348.42.

Contributor Name	Amount	Date	Report Not Showing Contribution
Unknown - Rally.org	\$95.50	9/20/16	October Quarterly 2016
Zachary M. Brunnert	\$50.00	9/23/16	October Quarterly 2016
Sheila Renee Stuart	\$100.00	10/28/16	30 Day After General Election - 11/8/16
Credit Card Socket Telecom	\$20.00	2/6/17	April Quarterly 2017
Expedia	\$14.36	10/17/17	January Quarterly 2018
Regions Bank	\$32.31	11/8/17	January Quarterly 2018
Regions Bank	\$36.25	11/15/17	January Quarterly 2018
Total	\$348.42		

19. Respondents failed to report ten contributions over \$100.00, totaling \$27,800.00.

Contributor Name	Amount	Date	Report Not Showing Contribution
Missouri Medical PAC	\$350.00	9/23/16	October Quarterly 2016
Missouri Realtors PAC, Inc.	\$250.00	9/23/16	October Quarterly 2016
BNSF Railway Company	\$500.00	9/23/16	October Quarterly 2016
Citizens to Re-Elect Hazel Erby	\$200.00	9/23/16	October Quarterly 2016
Ameren Missouri PAC	\$325.00	9/23/16	October Quarterly 2016
Trent Watson, LLC	\$125.00	9/23/16	October Quarterly 2016
Elizabeth Lauber Consulting, LLC	\$300.00	9/23/16	October Quarterly 2016
K12 Management Inc.	\$500.00	10/28/16	30 Day After General Election - 11/8/16
Safer Families for Missouri	\$250.00	10/28/16	30 Day After General Election - 11/8/16
David & Debra Humphreys	\$25,000.00	12/14/16	April Quarterly 2017
Total	\$27,800.00		

20. Respondents failed to report three miscellaneous receipts, totaling \$1,060.00.

Receipt Name	Amount	Date	Report Not Showing Misc Report
Paypal * electte	\$250.00	4/6/17	July Quarterly 2017
Arbor Village	\$560.00	11/14/17	January Quarterly 2018
The Saint Louis American Newspaper	\$250.00	11/15/17	January Quarterly 2018
Total	\$1,060.00		

COUNT VII

Failure to report expenditures and contributions made

21. Respondents failed to report six-hundred ninety-four expenditures of \$100.00 or less, totaling \$16,065.64, including a contribution made of \$60.55. See Attachment 1.

22. Respondents failed to report seventy-eight expenditures over \$100.00, totaling \$19,590.72, including a contribution made of \$250.00. See Attachment 2.

23. Respondents failed to report a transfer of \$302.45 from the official fund depository account to a personal account held by Respondent Curtis.

COUNT VIII

Failure to maintain committee records in accordance with accepted normal bookkeeping procedures

24. Respondents did not provide invoices, checks, receipts, and deposit records necessary to verify some of the contributions that Respondents received and expenditures that Respondents made.

CONCLUSIONS OF LAW

COUNT I

Failure to maintain an official fund depository

25. Every committee must maintain a single “official fund depository within this state which shall be a federally or state-chartered bank, a federally or state-chartered savings and loan association, or a federally or state-chartered credit union in which the committee shall open and thereafter maintain at least one official depository account in its own name.” § 130.021.4(1), RSMo.

26. The statement of committee organization must include the “name and mailing address of its depository, and the name and account number of each account the committee has in the depository.” § 130.021.5, RSMo.

27. If there is any change to the official fund depository account number, “an amended statement of organization shall be filed within twenty days after the change occurs, but no later than the date of the filing of the next report required to be filed by that committee.” § 130.021.7, RSMo.

Accepting contributions and making expenditures through accounts that were not Respondents’ official fund depository account

28. All contributions received by a candidate “and any of the candidate’s own funds to be used in support of the person’s candidacy shall be deposited in a candidate committee depository account established pursuant to the provisions of subsection 4 of this section.” § 130.021.2, RSMo.

29. “All contributions which the committee receives in money, checks and other negotiable instruments shall be deposited in a committee’s official depository account.” § 130.021.4(1), RSMo.

30. “Contributions shall not be accepted and expenditures shall not be made by a committee except by or through an official depository account.” § 130.021.4(1), RSMo.

31. There is probable cause to believe that Respondents violated Sections 130.021.4(1), 130.021.5, 130.021.7, and 130.021.2, RSMo, by failing to report the closing of the official fund depository account listed on the Statement of Committee Organization and the opening and closing of another account in the name of the committee, by accepting three contributions and making nineteen expenditures that were not deposited into or made from the official fund depository account, and that Respondents did so knowingly.

COUNT II

Unauthorized use of campaign contributions and using committee funds for expenditures reimbursed by the House of Representatives

32. Committee funds may be used only for purposes allowed by law, and expenses incurred in connection with the duties of a holder of elective office must be “ordinary and necessary.” § 130.034.2(2), RSMo.

33. There is probable cause to believe that Respondents violated Section 130.034, RSMo, by transferring \$302.45 from the official fund depository account to a personal account held by Respondent Curtis and by making sixty-two expenditures that were not allowed by law because they were not “ordinary and necessary” expenses incurred in connection with the duties of a holder of elective office, and that Respondents did so knowingly.

COUNT III

Commingling committee fund with funds of others

34. “Contributions received by a committee shall not be commingled with any funds of an agent of the committee, a candidate or any other person, except that contributions from a candidate of the candidate’s own funds to the person’s candidate committee shall be deposited to an official depository account of the person’s candidate committee.” §130.021.4(1), RSMo.

35. There is probable cause to believe that Respondents violated Section 130.021.4(1), RSMo, by commingling at least \$1,000 in committee funds with Respondent Curtis's personal funds, and that Respondents did so knowingly.

COUNT IV

Cash contributions and expenditures in excess of limits

36. For purposes of Chapter 130, RSMo, cash means "currency, coin, United States postage stamps, or any negotiable instrument which can be transferred from one person to another person without the signature or endorsement of the transferor." § 130.011(4), RSMo.

37. "Except for expenditures from a petty cash fund which is established and maintained by withdrawals of funds from the committee's depository account and with records maintained pursuant to the record-keeping requirements of section 130.036 to account for expenditures made from petty cash, each expenditure of more than fifty dollars, except an in-kind expenditure, shall be made by check drawn on the committee's depository and signed by the committee treasurer, deputy treasurer or candidate." §130.031.2, RSMo.

38. There is probable cause to believe that Respondents violated Section 130.031.2, RSMo, by making seven cash expenditures that were in excess of \$50.00 each, and that Respondents did so knowingly.

COUNT V

Failure to timely and accurately file campaign finance disclosure reports with cumulative information from the date of the last report

39. Candidate committees must file regular campaign finance disclosure reports at the following times and for the following periods:

- (1) Not later than the eighth day before an election for the period closing on the twelfth day before the election if the committee has made any contribution or expenditure either in support or opposition to any candidate or ballot measure;
- (2) Not later than the thirtieth day after an election for a period closing on the twenty-fifth day after the election, if the committee has made any contribution or expenditure either in support of or opposition to any candidate or ballot

measure; except that, a successful candidate who takes office prior to the twenty-fifth day after the election shall have complied with the report requirement of this subdivision if a disclosure report is filed by such candidate and any candidate committee under the candidate's control before such candidate takes office, and such report shall be for the period closing on the day before taking office; and

(3) Not later than the fifteenth day following the close of each calendar quarter. Notwithstanding the provisions of this subsection, if any committee accepts contributions or makes expenditures in support of or in opposition to a ballot measure or a candidate, and the report required by this subsection for the most recent calendar quarter is filed prior to the fortieth day before the election on the measure or candidate, the committee shall file an additional disclosure report not later than the fortieth day before the election for the period closing on the forty-fifth day before the election.

§130.046.1, RSMo.

40. Pursuant to Section 130.046.5(2), RSMo:

No disclosure report needs to be filed for any reporting period if during that reporting period the committee has neither received contributions aggregating more than five hundred dollars nor made expenditure aggregating more than five hundred dollars and has not received contributions aggregating more than three hundred dollars from any single contributor and if the committee's treasurer files a statement with the appropriate officer that the committee has not exceeded the identified thresholds in the reporting period. Any contributions received or expenditures made which are not reported because this statement is filed in lieu of a disclosure report shall be included in the next disclosure report filed by the committee.

41. "All individuals and committees required to file disclosure reports under section 130.041 shall electronically report any contribution by any single contributor which exceeds five thousand dollars to the Missouri ethics commission within forty-eight hours of receiving the contribution." §130.044.1, RSMo.

42. There is probable cause to believe that Respondents violated Sections 130.046.1, 130.046.5(2), and 130.044.1, RSMo, by failing to timely file four Limited Activity Statements and a 48 Hour Report of Contribution over \$5,000 and by filing nine Limited Activity Statements that should have been filed as full disclosure reports, and that Respondents did so knowingly.

COUNT VI

Failure to report contributions received

43. Candidate committees are required to report receipts for each reporting period, including:

- (a) Total amount of all monetary contributions received which can be identified in the committee's records by name and address of each contributor. In addition, the candidate committee shall make a reasonable effort to obtain and report the employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received one or more contributions which in the aggregate total in excess of one hundred dollars and shall make a reasonable effort to obtain and report a description of any contractual relationship over five hundred dollars between the contributor and the state if the candidate is seeking election to a state office or between the contributor and any political subdivision of the state if the candidate is seeking election to another political subdivision of the state;
- (b) Total amount of all anonymous contributions accepted;
- (c) Total amount of all monetary contributions received through fund-raising events or activities from participants whose names and addresses were not obtained with such contributions, with an attached statement or copy of the statement describing each fund-raising event as required in subsection 6 of section 130.031;
- (d) Total dollar value of all in-kind contributions received;
- (e) A separate listing by name and address and employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received contributions, in money or any other thing of value, aggregating more than one hundred dollars, together with the date and amount of each such contribution;
- (f) A listing of each loan received by name and address of the lender and date and amount of the loan. For each loan of more than one hundred dollars, a separate statement shall be attached setting forth the name and address of the lender and each person liable directly, indirectly or contingently, and the date, amount and terms of the loan[.]

§ 130.041.1(3), RSMo.

44. There is probable cause to believe that Respondents violated Section 130.041.1(3), RSMo, by failing to report seventeen contributions and by failing to report three miscellaneous receipts, and that Respondents did so knowingly.

COUNT VII

Failure to report expenditures and contributions made

45. Candidate committees are required to report expenditures for each reporting period, including:

- (a) The total dollar amount of expenditures made by check drawn on the committee's depository;
- (b) The total dollar amount of expenditures made in cash;
- (c) The total dollar value of all in-kind expenditures made;
- (d) The full name and mailing address of each person to whom an expenditure of money or any other thing of value in the amount of more than one hundred dollars has been made, contracted for or incurred, together with the date, amount and purpose of each expenditure. Expenditures of one hundred dollars or less may be grouped and listed by categories of expenditure showing the total dollar amount of expenditures in each category, except that the report shall contain an itemized listing of each payment made to campaign workers by name, address, date, amount and purpose of each payment and the aggregate amount paid to each such worker;
- (e) A list of each loan made, by name and mailing address of the person receiving the loan, together with the amount, terms and date[.]

§ 130.041.1(4), RSMo.

46. There is probable cause to believe that Respondents violated Section 130.041.1(4), RSMo, by failing to report seven hundred seventy-two expenditures, and by failing to report a transfer of \$302.45 from the official fund depository account to Respondent Curtis's personal account, and that Respondents did so knowingly.

COUNT VIII

Failure to maintain committee records in accordance with accepted normal bookkeeping procedures

47. "The candidate, treasurer or deputy treasurer of a committee shall maintain accurate records and accounts on a current basis." §130.036.1, RSMo.

48. "The records and accounts shall be maintained in accordance with accepted normal bookkeeping procedures and shall contain the bills, receipts, deposit records, cancelled checks and

other detailed information necessary to prepare and substantiate any statement or report required to be filed pursuant to this chapter.” § 130.036.1, RSMo.

49. “All records and accounts of receipts and expenditures shall be preserved for at least three years after the date of the election to which the records pertain. Records and accounts regarding supplemental disclosure reports or reports not required pursuant to an election shall be preserved for at least three years after the date of the report to which the records pertain. Such records shall be available for inspection by the campaign finance review board and its duly authorized representatives.” § 130.036.8, RSMo.

50. There is probable cause to believe that Respondents violated Sections 130.036.1 and 130.036.8, RSMo, by failing to maintain the committee’s finance records in accordance with accepted normal bookkeeping procedures, including bills, receipts, deposit records, cancelled checks and other detailed information necessary to prepare and substantiate any statement or report required under Chapter 130, RSMo, and that Respondents did so knowingly.

Attachment 1.

Expenditure Name	Amount	Date	Report Not Showing Expenditure
Adobe creative	\$29.99	8/29/16	October Quarterly 2016
No. 10 Thomas	\$42.55	8/29/16	October Quarterly 2016
No. 10 Thomas	\$26.88	8/29/16	October Quarterly 2016
No. 10 Thomas	\$25.90	8/29/16	October Quarterly 2016
Brasserie Beck	\$45.10	8/29/16	October Quarterly 2016
Lost Society	\$99.55	8/29/16	October Quarterly 2016
El Centro D.F.	\$40.90	8/29/16	October Quarterly 2016
Ben s Next Door	\$23.60	8/29/16	October Quarterly 2016
Logan Tavern	\$65.73	8/29/16	October Quarterly 2016
Joe Theismanns	\$12.90	8/29/16	October Quarterly 2016
Hillary Victory	\$60.55	8/29/16	October Quarterly 2016
Bestbuy.com	\$48.67	8/30/16	October Quarterly 2016
Joe Thiesmanns	\$9.70	8/30/16	October Quarterly 2016
Airport BP	\$34.86	8/30/16	October Quarterly 2016
Washington Plaza	\$52.97	8/30/16	October Quarterly 2016
Ernie S. Origina	\$86.10	8/31/16	October Quarterly 2016
Hudson News	\$2.44	8/31/16	October Quarterly 2016
Hilton Alexandra	\$37.00	9/1/16	October Quarterly 2016
American Air	\$25.00	9/1/16	October Quarterly 2016
VTG Gateway	\$13.26	9/1/16	October Quarterly 2016
Facebook	\$31.04	9/1/16	October Quarterly 2016
Drakes Place	\$10.43	9/1/16	October Quarterly 2016
Drakes Place	\$32.27	9/2/16	October Quarterly 2016
Papa Johns	\$18.02	9/2/16	October Quarterly 2016
Sp* Trap	\$90.00	9/6/16	October Quarterly 2016
St. Nicholas Gr	\$42.00	9/6/16	October Quarterly 2016
The Loading Dock	\$15.00	9/6/16	October Quarterly 2016
Wildflower Rest	\$53.92	9/7/16	October Quarterly 2016
Sub Zero Vodka	\$19.75	9/8/16	October Quarterly 2016
Shell Oil 57443	\$31.51	9/12/16	October Quarterly 2016
Ferguson Brewing	\$10.42	9/12/16	October Quarterly 2016
Drakes Place	\$10.43	9/12/16	October Quarterly 2016
Drakes Place	\$23.46	9/12/16	October Quarterly 2016
Cathys Kitchen	\$38.42	9/12/16	October Quarterly 2016
Santuaria	\$48.35	9/12/16	October Quarterly 2016
The Wheelhouse	\$16.50	9/12/16	October Quarterly 2016
Atomic Cowboy	\$8.00	9/12/16	October Quarterly 2016
Ferguson Brewing	\$10.42	9/12/16	October Quarterly 2016
Kilroy S	\$13.00	9/12/16	October Quarterly 2016
BP#8795221	\$31.87	9/13/16	October Quarterly 2016

International Svc Assessment Ginosi Apartels	\$28.54	9/14/16	October Quarterly 2016
Ol Henry Rest.	\$58.10	9/14/16	October Quarterly 2016
Blondie's Coffee	\$6.49	9/14/16	October Quarterly 2016
Constantcontact.com	\$40.00	9/14/16	October Quarterly 2016
J Pfenny's	\$12.52	9/15/16	October Quarterly 2016
J Pfenny's	\$20.75	9/15/16	October Quarterly 2016
Arris Pizza	\$29.09	9/15/16	October Quarterly 2016
Amtrack Mobile 258	\$27.00	9/16/16	October Quarterly 2016
Amtrak Dining	\$6.50	9/16/16	October Quarterly 2016
Uber	\$7.75	9/16/16	October Quarterly 2016
The Boss Bar	\$60.00	9/19/16	October Quarterly 2016
Uber	\$10.88	9/19/16	October Quarterly 2016
Uber	\$5.00	9/19/16	October Quarterly 2016
Uber	\$32.10	9/19/16	October Quarterly 2016
Uber	\$5.40	9/19/16	October Quarterly 2016
Uber	\$6.59	9/19/16	October Quarterly 2016
Uber	\$3.99	9/19/16	October Quarterly 2016
Uber	\$3.82	9/19/16	October Quarterly 2016
Mailchimp	\$20.00	9/19/16	October Quarterly 2016
Uber	\$3.77	9/19/16	October Quarterly 2016
Uber	\$10.99	9/19/16	October Quarterly 2016
Uber	\$12.36	9/19/16	October Quarterly 2016
Uber	\$3.21	9/20/16	October Quarterly 2016
Uber	\$3.21	9/20/16	October Quarterly 2016
Hostgator.com	\$29.95	9/20/16	October Quarterly 2016
Uber	\$7.35	9/21/16	October Quarterly 2016
Ferguson BP	\$36.03	9/21/16	October Quarterly 2016
Regions Bank	\$5.00	9/21/16	October Quarterly 2016
American Air	\$25.00	9/22/16	October Quarterly 2016
Mangia Italiano	\$35.90	9/23/16	October Quarterly 2016
The Coffee Cart	\$7.28	9/26/16	October Quarterly 2016
Scribd.com	\$8.99	9/26/16	October Quarterly 2016
Lafayette Hotel New Orleans	\$76.84	9/26/16	October Quarterly 2016
Uber	\$5.95	9/26/16	October Quarterly 2016
Uber	\$7.93	9/26/16	October Quarterly 2016
Adobe creative	\$29.99	9/27/16	October Quarterly 2016
Constantcontact.com	\$40.00	10/14/16	8 Day Before General Election 11/8/16
Qt 602	\$0.87	10/17/16	8 Day Before General Election 11/8/16
Bar Louis	\$24.53	10/17/16	8 Day Before General Election 11/8/16
Shell Oil 57443	\$1.26	10/18/16	8 Day Before General Election 11/8/16

Exxonmobil	\$3.76	10/19/16	8 Day Before General Election 11/8/16
Mailchimp	\$10.00	10/19/16	8 Day Before General Election 11/8/16
Hostgator.com	\$29.95	10/20/16	8 Day Before General Election 11/8/16
Shell Oil 57443	\$2.52	10/20/16	8 Day Before General Election 11/8/16
Buchann Energy	\$5.23	10/20/16	8 Day Before General Election 11/8/16
Regions Bank	\$5.00	10/20/16	8 Day Before General Election 11/8/16
Crazy Bowls & W	\$10.41	10/21/16	8 Day Before General Election 11/8/16
Nathalies	\$20.00	10/21/16	8 Day Before General Election 11/8/16
Sugarfire Smoke	\$19.28	10/24/16	8 Day Before General Election 11/8/16
Nacho Mamas	\$34.20	10/24/16	8 Day Before General Election 11/8/16
Phillips 66	\$11.94	10/24/16	8 Day Before General Election 11/8/16
Slu Univ Card F 8220 St Louis MO 63103	\$20.00	10/24/16	8 Day Before General Election 11/8/16
Chaifetz Arena	\$13.50	10/24/16	8 Day Before General Election 11/8/16
Chaifetz Arena	\$9.25	10/24/16	8 Day Before General Election 11/8/16
Chaifetz Arena	\$8.75	10/24/16	8 Day Before General Election 11/8/16
Phillips 66	\$15.00	10/24/16	8 Day Before General Election 11/8/16
Straubs	\$23.42	10/24/16	8 Day Before General Election 11/8/16
Straubs	\$34.51	10/24/16	8 Day Before General Election 11/8/16
Scribd.com	\$8.99	10/25/16	8 Day Before General Election 11/8/16
Family Dollar #5331	\$4.84	10/25/16	8 Day Before General Election 11/8/16
Family Dollar #5331	\$3.65	10/25/16	8 Day Before General Election 11/8/16
Family Dollar #5331	\$7.50	10/25/16	8 Day Before General Election 11/8/16
Park Avenue Coffee	\$5.51	10/26/16	8 Day Before General Election 11/8/16

Adobe creative	\$29.99	10/27/16	8 Day Before General Election 11/8/16
Uber	\$5.00	10/27/16	8 Day Before General Election 11/8/16
Quiktrip	\$35.32	10/27/16	8 Day Before General Election 11/8/16
Ameristar Casino	\$7.50	10/28/16	30 Day After General Election 11/8/16
BP#8795221	\$1.88	10/28/16	30 Day After General Election 11/8/16
Drakes Place	\$17.00	10/31/16	30 Day After General Election 11/8/16
Ameristar Pearl's	\$19.15	10/31/16	30 Day After General Election 11/8/16
Name-Cheap	\$22.99	11/2/16	30 Day After General Election 11/8/16
Trader Joe S #6	\$8.48	11/2/16	30 Day After General Election 11/8/16
St. Louis Bread	\$4.81	11/3/16	30 Day After General Election 11/8/16
BP#8795221	\$5.31	11/3/16	30 Day After General Election 11/8/16
BP#8795221	\$31.62	11/3/16	30 Day After General Election 11/8/16
BP#8795221	\$3.48	11/3/16	30 Day After General Election 11/8/16
Bonefish Grill	\$11.66	11/4/16	30 Day After General Election 11/8/16
BP#8766966	\$10.82	11/4/16	30 Day After General Election 11/8/16
Tucker St. Charles	\$4.00	11/4/16	30 Day After General Election 11/8/16
Bar Louis Saint	\$15.69	11/7/16	30 Day After General Election 11/8/16
SeatEngine Ticketing	\$61.51	11/7/16	30 Day After General Election 11/8/16
BP#8795221	\$25.01	11/7/16	30 Day After General Election 11/8/16
Ameristar St. Charles	\$10.85	11/7/16	30 Day After General Election 11/8/16
Save-A-lot #9	\$4.16	11/7/16	30 Day After General Election 11/8/16
Schnucks 4171	\$9.46	11/7/16	30 Day After General Election 11/8/16
Schnucks 4171	\$8.73	11/7/16	30 Day After General Election 11/8/16

5 Guys	\$11.72	11/8/16	30 Day After General Election 11/8/16
QT 610	\$6.69	11/9/16	30 Day After General Election 11/8/16
Drakes Place	\$20.28	11/10/16	30 Day After General Election 11/8/16
Constantcontact.com	\$40.00	11/14/16	30 Day After General Election 11/8/16
Regions Bank	\$5.00	11/18/16	30 Day After General Election 11/8/16
Mailchimp	\$10.00	11/21/16	30 Day After General Election 11/8/16
Hostgator.com	\$29.95	11/21/16	30 Day After General Election 11/8/16
Scribd.com	\$8.99	11/25/16	30 Day After General Election 11/8/16
Uber	\$12.11	11/25/16	30 Day After General Election 11/8/16
Uber	\$12.52	11/25/16	30 Day After General Election 11/8/16
Adobe creative	\$29.99	11/28/16	30 Day After General Election 11/8/16
Uber	\$3.46	12/1/16	30 Day After General Election 11/8/16
Uber	\$3.46	12/2/16	30 Day After General Election 11/8/16
Uber	\$5.00	12/2/16	30 Day After General Election 11/8/16
Uber	\$6.41	12/5/16	April Quarterly 2017
Uber	\$3.00	12/5/16	April Quarterly 2017
Uber	\$5.00	12/5/16	April Quarterly 2017
Uber	\$3.25	12/5/16	April Quarterly 2017
Uber	\$3.00	12/5/16	April Quarterly 2017
Uber	\$16.32	12/7/16	April Quarterly 2017
Uber	\$5.09	12/7/16	April Quarterly 2017
Uber	\$5.00	12/7/16	April Quarterly 2017
Uber	\$3.00	12/7/16	April Quarterly 2017
Uber	\$6.41	12/8/16	April Quarterly 2017
Uber	\$5.77	12/8/16	April Quarterly 2017
Uber	\$5.00	12/8/16	April Quarterly 2017
Uber	\$5.00	12/8/16	April Quarterly 2017
Uber	\$6.41	12/8/16	April Quarterly 2017
Uber	\$3.00	12/8/16	April Quarterly 2017
Uber	\$34.67	12/12/16	April Quarterly 2017
Uber	\$29.75	12/12/16	April Quarterly 2017

Uber	\$15.20	12/12/16	April Quarterly 2017
Uber	\$27.93	12/12/16	April Quarterly 2017
Uber	\$8.99	12/12/16	April Quarterly 2017
Uber	\$7.99	12/12/16	April Quarterly 2017
Uber	\$7.83	12/12/16	April Quarterly 2017
Constantcontact.com	\$40.00	12/14/16	April Quarterly 2017
Mailchimp	\$10.00	12/19/16	April Quarterly 2017
Regions Bank	\$5.00	12/19/16	April Quarterly 2017
Hostgator.com	\$29.95	12/20/16	April Quarterly 2017
Drakes Place	\$48.74	12/23/16	April Quarterly 2017
Scribd.com	\$8.99	12/27/16	April Quarterly 2017
Adobe creative	\$29.99	12/27/16	April Quarterly 2017
The Capital Grill	\$4.58	1/12/17	April Quarterly 2017
Baymont Inn and Stes	\$63.10	1/12/17	April Quarterly 2017
Straubs	\$15.29	1/13/17	April Quarterly 2017
Baymont Inn and Stes	\$63.10	1/17/17	April Quarterly 2017
Constantcontact.com	\$40.00	1/17/17	April Quarterly 2017
Auntie Anne	\$5.41	1/17/17	April Quarterly 2017
BP#8795221	\$34.49	1/17/17	April Quarterly 2017
TK Beauty	\$65.46	1/18/17	April Quarterly 2017
Convenient Food Mart	\$1.71	1/18/17	April Quarterly 2017
First Quality D	\$33.50	1/19/17	April Quarterly 2017
Mailchimp	\$10.00	1/19/17	April Quarterly 2017
Walgreens	\$22.15	1/19/17	April Quarterly 2017
Walgreens	\$12.93	1/19/17	April Quarterly 2017
Shell Oil 5542	\$34.21	1/19/17	April Quarterly 2017
Regions Bank	\$5.00	1/20/17	April Quarterly 2017
ATM withdrawal Ameristar	\$100.00	1/20/17	April Quarterly 2017
Hostgator.com	\$29.95	1/20/17	April Quarterly 2017
ATM	\$2.50	1/20/17	April Quarterly 2017
ATM	\$3.00	1/20/17	April Quarterly 2017
BP#8795221	\$3.76	1/23/17	April Quarterly 2017
Fandango.com	\$26.94	1/23/17	April Quarterly 2017
Exxonmobil	\$4.46	1/23/17	April Quarterly 2017
Exxonmobil	\$2.20	1/23/17	April Quarterly 2017
Phillips 66	\$33.00	1/24/17	April Quarterly 2017
Scribd.com	\$8.99	1/25/17	April Quarterly 2017
Baymont Inn and Stes	\$58.85	1/26/17	April Quarterly 2017
Adobe creative	\$29.99	1/27/17	April Quarterly 2017
Baymont Inn and Stes	\$63.10	1/30/17	April Quarterly 2017
BP#8795338	\$22.68	1/30/17	April Quarterly 2017
City of St Louis - P	\$1.85	1/30/17	April Quarterly 2017
Ameristar Casino	\$56.20	1/30/17	April Quarterly 2017
Uber	\$13.06	1/30/17	April Quarterly 2017
Uber	\$5.00	1/30/17	April Quarterly 2017

Uber	\$13.14	1/30/17	April Quarterly 2017
Godaddy.com	\$15.17	1/30/17	April Quarterly 2017
Baymont Inn and Suites	\$35.00	1/30/17	April Quarterly 2017
Socket telecom	\$20.00	2/1/17	April Quarterly 2017
Phillips 66	\$34.81	2/1/17	April Quarterly 2017
The Capital Grill	\$5.38	2/2/17	April Quarterly 2017
Straubs	\$23.87	2/3/17	April Quarterly 2017
Schnucks 4171	\$10.69	2/3/17	April Quarterly 2017
J Pfenney's	\$35.00	2/6/17	April Quarterly 2017
Thai 202	\$28.79	2/6/17	April Quarterly 2017
Nacho Mamas	\$29.02	2/6/17	April Quarterly 2017
Straubs	\$7.96	2/6/17	April Quarterly 2017
BP#8795221	\$35.66	2/6/17	April Quarterly 2017
Arbys 7764	\$6.77	2/6/17	April Quarterly 2017
McCarty Phillips	\$16.85	2/6/17	April Quarterly 2017
Family Dollar #5331	\$29.48	2/6/17	April Quarterly 2017
Steak N shake	\$4.30	2/7/17	April Quarterly 2017
Chipolte	\$7.00	2/7/17	April Quarterly 2017
B Clean	\$4.50	2/7/17	April Quarterly 2017
Sophias	\$80.28	2/8/17	April Quarterly 2017
Addisons	\$11.42	2/8/17	April Quarterly 2017
Yanis Coffee Zone	\$19.37	2/8/17	April Quarterly 2017
ATM	\$2.50	2/8/17	April Quarterly 2017
ATM	\$3.50	2/8/17	April Quarterly 2017
International B	\$0.85	2/9/17	April Quarterly 2017
Phillips 66	\$3.64	2/9/17	April Quarterly 2017
Break Time	\$19.70	2/9/17	April Quarterly 2017
Wendys	\$7.63	2/10/17	April Quarterly 2017
Arris Bistro	\$60.76	2/10/17	April Quarterly 2017
The Capital Grill	\$1.62	2/13/17	April Quarterly 2017
The Capital Grill	\$3.50	2/13/17	April Quarterly 2017
J Pfenney's	\$26.80	2/13/17	April Quarterly 2017
Exxonmobil	\$16.72	2/13/17	April Quarterly 2017
Straubs	\$8.13	2/13/17	April Quarterly 2017
Quiktrip	\$33.61	2/13/17	April Quarterly 2017
Starbucks	\$3.84	2/14/17	April Quarterly 2017
Sling.com	\$39.98	2/14/17	April Quarterly 2017
Constantcontact.com	\$40.00	2/14/17	April Quarterly 2017
Panera Bread 2	\$6.02	2/14/17	April Quarterly 2017
Wal-mart	\$12.77	2/14/17	April Quarterly 2017
Madisons café	\$97.17	2/16/17	April Quarterly 2017
Convenient Food Mart	\$6.35	2/16/17	April Quarterly 2017
Regions Bank	\$5.00	2/16/17	April Quarterly 2017
Shell Oil	\$35.14	2/17/17	April Quarterly 2017
Starbucks	\$4.82	2/17/17	April Quarterly 2017

Spectators	\$37.90	2/17/17	April Quarterly 2017
Love Sushi	\$22.95	2/17/17	April Quarterly 2017
ATM Capital Plaza	\$83.50	2/17/17	April Quarterly 2017
ATM Capital Plaza	\$2.50	2/17/17	April Quarterly 2017
J Pfenny's	\$10.00	2/21/17	April Quarterly 2017
Exxonmobil	\$28.80	2/21/17	April Quarterly 2017
Hostgator.com	\$29.95	2/21/17	April Quarterly 2017
Mailchimp	\$10.00	2/21/17	April Quarterly 2017
Ameristar St. Charles	\$15.80	2/21/17	April Quarterly 2017
5 guys	\$14.27	2/21/17	April Quarterly 2017
5 guys	\$15.36	2/21/17	April Quarterly 2017
Whole Foods	\$4.24	2/21/17	April Quarterly 2017
Target	\$6.01	2/21/17	April Quarterly 2017
Galleria 6 cinema	\$18.00	2/21/17	April Quarterly 2017
Panera Bread 2	\$15.34	2/21/17	April Quarterly 2017
BP#8769184	\$24.48	2/21/17	April Quarterly 2017
BP#8769184	\$5.60	2/21/17	April Quarterly 2017
Galleria 6 cinema	\$4.62	2/21/17	April Quarterly 2017
First Quality D	\$25.65	2/22/17	April Quarterly 2017
Godaddy.com	\$15.17	2/23/17	April Quarterly 2017
ATM	\$2.50	2/21/17	April Quarterly 2017
ATM	\$4.99	2/21/17	April Quarterly 2017
Jack in the box	\$8.90	2/23/17	April Quarterly 2017
Conoco	\$4.10	2/24/17	April Quarterly 2017
Conoco	\$10.99	2/24/17	April Quarterly 2017
Panera Bread 2	\$11.51	2/24/17	April Quarterly 2017
Scribd.com	\$8.99	2/27/17	April Quarterly 2017
The Capital Grill	\$7.93	2/27/17	April Quarterly 2017
Wendys	\$1.84	2/27/17	April Quarterly 2017
J Pfenny's	\$10.00	2/27/17	April Quarterly 2017
Phillips 66	\$29.54	2/27/17	April Quarterly 2017
Adobe creative	\$29.99	2/27/17	April Quarterly 2017
Walgreens	\$17.40	2/27/17	April Quarterly 2017
Crazy Bowls & W	\$23.80	2/27/17	April Quarterly 2017
Phillips 66	\$21.74	3/1/17	April Quarterly 2017
El Espolon	\$25.35	3/1/17	April Quarterly 2017
Colton s	\$61.86	3/1/17	April Quarterly 2017
High Street Pub	\$20.00	3/2/17	April Quarterly 2017
High Street Pub	\$30.00	3/2/17	April Quarterly 2017
Godaddy.com	\$15.17	3/2/17	April Quarterly 2017
ATM	\$2.50	3/3/17	April Quarterly 2017
ATM	\$4.99	3/3/17	April Quarterly 2017
J Pfenny's	\$20.00	3/3/17	April Quarterly 2017
J Pfenny's	\$18.25	3/3/17	April Quarterly 2017
Jack in the box	\$5.57	3/3/17	April Quarterly 2017

Arris Pizza	\$30.84	3/3/17	April Quarterly 2017
ATM Regions Bank	\$100.00	3/3/17	April Quarterly 2017
Break Time	\$10.66	3/3/17	April Quarterly 2017
Phillips 66	\$4.40	3/6/17	April Quarterly 2017
Phillips 66	\$27.43	3/6/17	April Quarterly 2017
Ameristar Bakery	\$5.88	3/6/17	April Quarterly 2017
ATM	\$2.50	3/6/17	April Quarterly 2017
ATM	\$4.99	3/6/17	April Quarterly 2017
Holiday Inn	\$41.57	3/13/17	April Quarterly 2017
Starbucks	\$9.65	3/13/17	April Quarterly 2017
Hibachi Grill	\$48.78	3/16/17	April Quarterly 2017
J P fenny's	\$70.00	3/17/17	April Quarterly 2017
Spectators	\$98.00	3/17/17	April Quarterly 2017
Redbox	\$29.09	3/20/17	April Quarterly 2017
Ameristar Casino	\$45.00	3/20/17	April Quarterly 2017
Hostgator.com	\$29.95	3/20/17	April Quarterly 2017
Sheesh Restaurant	\$58.43	3/21/17	April Quarterly 2017
Regions Bank	\$5.00	3/22/17	April Quarterly 2017
Drakes Place	\$40.00	3/24/17	April Quarterly 2017
BP#8795221	\$36.61	3/24/17	April Quarterly 2017
Ferguson Brewing	\$37.71	3/27/17	April Quarterly 2017
Urban Chestnut	\$8.50	3/27/17	April Quarterly 2017
Drakes Place	\$12.64	3/27/17	April Quarterly 2017
Brennans, Inc.	\$30.13	3/27/17	April Quarterly 2017
ATM Withdrawal	\$43.00	3/27/17	April Quarterly 2017
ATM	\$2.50	3/27/17	April Quarterly 2017
Arris Pizza	\$17.47	3/28/17	April Quarterly 2017
Spectators	\$22.00	3/29/17	April Quarterly 2017
Bones Restaurant	\$34.50	3/29/17	April Quarterly 2017
The Grand Café	\$47.28	3/31/17	April Quarterly 2017
J P fenny's	\$28.00	4/3/17	July Quarterly 2017
J P fenny's	\$41.89	4/3/17	July Quarterly 2017
Spectators	\$21.25	4/3/17	July Quarterly 2017
Doubletree hotel	\$27.70	4/3/17	July Quarterly 2017
Doubletree hotel	\$50.00	4/3/17	July Quarterly 2017
Uber	\$53.67	4/3/17	July Quarterly 2017
The Tiger Hotel	\$64.00	4/4/17	July Quarterly 2017
Chipolte	\$31.73	4/4/17	July Quarterly 2017
TG S Lounge	\$45.00	4/6/17	July Quarterly 2017
Spectators	\$42.00	4/6/17	July Quarterly 2017
Spectators	\$60.00	4/7/17	July Quarterly 2017
Addisons	\$67.37	4/10/17	July Quarterly 2017
The Shot Bar	\$70.32	4/10/17	July Quarterly 2017
Chilis	\$66.15	4/12/17	July Quarterly 2017
Gamlin Whiskey	\$86.00	4/17/17	July Quarterly 2017

Tellers Gallery	\$50.10	4/19/17	July Quarterly 2017
Regions Bank	\$5.00	4/19/17	July Quarterly 2017
TGI Friday	\$22.91	4/20/17	July Quarterly 2017
Cajun Catfish	\$29.53	4/20/17	July Quarterly 2017
Hostgator.com	\$29.95	4/20/17	July Quarterly 2017
The Capital Grill	\$10.28	4/24/17	July Quarterly 2017
Doubletree hotel	\$57.55	4/26/17	July Quarterly 2017
Arris Bistro	\$38.81	4/26/17	July Quarterly 2017
Spectators	\$49.00	4/27/17	July Quarterly 2017
Wal-mart	\$74.61	4/27/17	July Quarterly 2017
The Capital Grill	\$25.74	4/28/17	July Quarterly 2017
J Pfenny's	\$44.47	5/1/17	July Quarterly 2017
Drakes Place	\$11.55	5/1/17	July Quarterly 2017
Straubs	\$30.33	5/1/17	July Quarterly 2017
Drakes Place	\$36.19	5/2/17	July Quarterly 2017
Venmo	\$100.00	5/3/17	July Quarterly 2017
TG S Lounge	\$50.75	5/3/17	July Quarterly 2017
Spectators	\$43.50	5/5/17	July Quarterly 2017
Perkins Rest	\$44.73	5/8/17	July Quarterly 2017
Llywelyns Pub	\$39.50	5/8/17	July Quarterly 2017
J Pfenny's	\$12.75	5/10/17	July Quarterly 2017
Sawadee	\$51.83	5/11/17	July Quarterly 2017
Spectators	\$22.00	5/12/17	July Quarterly 2017
J Pfenny's	\$80.93	5/15/17	July Quarterly 2017
J Pfenny's	\$40.00	5/15/17	July Quarterly 2017
J Pfenny's	\$72.89	5/15/17	July Quarterly 2017
Sandrinas	\$95.06	5/15/17	July Quarterly 2017
Ol Henry Rest.	\$45.37	5/17/17	July Quarterly 2017
Cathys Kitchen	\$17.09	5/18/17	July Quarterly 2017
Ferguson Brewin	\$71.44	5/19/17	July Quarterly 2017
Tellers Gallery	\$11.00	5/19/17	July Quarterly 2017
Addisons	\$45.07	5/19/17	July Quarterly 2017
Regions Bank	\$5.00	5/19/17	July Quarterly 2017
Phillips 66	\$36.16	5/22/17	July Quarterly 2017
Lorenzos Tratto	\$62.47	5/22/17	July Quarterly 2017
Hostgator.com	\$29.95	5/22/17	July Quarterly 2017
Uber	\$15.21	5/22/17	July Quarterly 2017
Sq* style	\$52.06	5/22/17	July Quarterly 2017
Sanctuararia	\$30.57	5/22/17	July Quarterly 2017
Gerbes	\$30.15	5/25/17	July Quarterly 2017
Uber	\$8.40	5/25/17	July Quarterly 2017
Uber	\$9.08	5/25/17	July Quarterly 2017
ATM withdrawal - One Ameristar	\$43.50	5/25/17	July Quarterly 2017
Mid K Beauty	\$75.92	5/25/17	July Quarterly 2017
ATM	\$2.50	5/25/17	July Quarterly 2017

J Pfenny's	\$15.00	5/26/17	July Quarterly 2017
Spectators	\$12.00	5/26/17	July Quarterly 2017
The Zebra Room	\$31.76	5/26/17	July Quarterly 2017
Uber	\$10.48	5/26/17	July Quarterly 2017
Lidia S Kansas	\$57.38	5/26/17	July Quarterly 2017
Uber	\$9.88	5/26/17	July Quarterly 2017
The Jacobson	\$30.97	5/26/17	July Quarterly 2017
Uber	\$5.85	5/26/17	July Quarterly 2017
Uber	\$6.93	5/26/17	July Quarterly 2017
Gamlin Whiskey	\$39.71	5/30/17	July Quarterly 2017
Pi Pizzeria	\$32.79	5/30/17	July Quarterly 2017
Sugarfire Smoke	\$42.62	5/30/17	July Quarterly 2017
Uber	\$33.47	6/1/17	July Quarterly 2017
Uber	\$5.85	6/5/17	July Quarterly 2017
Uber	\$5.85	6/5/17	July Quarterly 2017
Chipolte	\$12.06	6/12/17	July Quarterly 2017
Llywelyns Pub	\$35.52	6/12/17	July Quarterly 2017
Kolache Factory	\$17.38	6/12/17	July Quarterly 2017
Uber	\$6.69	6/14/17	July Quarterly 2017
Uber	\$12.03	6/14/17	July Quarterly 2017
Ollies Lebanese	\$42.92	6/14/17	July Quarterly 2017
Wildflower Rest	\$50.25	6/20/17	July Quarterly 2017
Hostgator.com	\$29.95	6/20/17	July Quarterly 2017
Regions Bank	\$5.00	6/21/17	July Quarterly 2017
Bar Louis	\$20.88	6/26/17	July Quarterly 2017
Gamlin Whiskey	\$32.40	6/26/17	July Quarterly 2017
Sq *the corner	\$6.18	6/27/17	July Quarterly 2017
Ol Henry Rest.	\$35.47	6/28/17	July Quarterly 2017
Dollar Tree	\$8.73	7/3/17	October Quarterly 2017
Party City	\$9.76	7/3/17	October Quarterly 2017
Sq* Meats & mor	\$10.00	7/3/17	October Quarterly 2017
Sq* Marva Colvi	\$10.70	7/3/17	October Quarterly 2017
Gamlin Whiskey	\$70.32	7/5/17	October Quarterly 2017
Pret a Manager	\$7.68	7/10/17	October Quarterly 2017
Lost Society	\$45.45	7/10/17	October Quarterly 2017
W Wash DC Dinin	\$90.35	7/10/17	October Quarterly 2017
Lost Society	\$84.27	7/10/17	October Quarterly 2017
Lost Society	\$48.91	7/10/17	October Quarterly 2017
Lost Society	\$20.23	7/10/17	October Quarterly 2017
Redrocks	\$18.30	7/10/17	October Quarterly 2017
Sq* airport	\$11.48	7/10/17	October Quarterly 2017
Hilton Banquets	\$33.23	7/11/17	October Quarterly 2017
Café Saint - Ex	\$16.00	7/11/17	October Quarterly 2017
Cava Mezze Medi	\$17.22	7/11/17	October Quarterly 2017
Fedexoffice	\$3.50	7/11/17	October Quarterly 2017

Japanese Amer N. Los Angelos, CA	\$21.85	7/12/17	October Quarterly 2017
The Boiling Crab	\$99.31	7/13/17	October Quarterly 2017
Find your Feet	\$32.61	7/17/17	October Quarterly 2017
Sportssprint	\$50.00	7/20/17	October Quarterly 2017
Godaddy.com	\$9.34	7/20/17	October Quarterly 2017
Regions Bank	\$5.00	7/20/17	October Quarterly 2017
Hostgator.com	\$29.95	7/20/17	October Quarterly 2017
Venmo	\$15.00	7/27/17	October Quarterly 2017
BP	\$25.00	7/31/17	October Quarterly 2017
CallFire	\$25.00	8/3/17	October Quarterly 2017
Venmo	\$40.00	8/7/17	October Quarterly 2017
Salt and Smoke	\$12.87	8/7/17	October Quarterly 2017
Sugarfire Smoke	\$22.07	8/8/17	October Quarterly 2017
Magnolia hotel	\$15.00	8/9/17	October Quarterly 2017
Kaldi S.	\$8.32	8/10/17	October Quarterly 2017
Cathys Kitchen	\$48.09	8/10/17	October Quarterly 2017
Uber	\$15.99	8/10/17	October Quarterly 2017
Uber	\$10.00	8/11/17	October Quarterly 2017
Paddy O S	\$49.00	8/11/17	October Quarterly 2017
Paddy O S	\$6.00	8/11/17	October Quarterly 2017
Uber	\$14.34	8/11/17	October Quarterly 2017
Uber	\$5.00	8/11/17	October Quarterly 2017
Fox Sports Midwest	\$10.00	8/11/17	October Quarterly 2017
Budweiser Brewery	\$10.00	8/14/17	October Quarterly 2017
Fox Sports Midwest	\$30.00	8/14/17	October Quarterly 2017
Hilton 360 Bar	\$26.50	8/14/17	October Quarterly 2017
Hilton 360 Bar	\$70.50	8/14/17	October Quarterly 2017
Calecos Downtown	\$91.25	8/14/17	October Quarterly 2017
Calecos Downtown	\$41.83	8/14/17	October Quarterly 2017
CallFire	\$3.00	8/14/17	October Quarterly 2017
CallFire	\$0.20	8/14/17	October Quarterly 2017
Hilton 360 Bar	\$95.57	8/14/17	October Quarterly 2017
Reeds American	\$52.13	8/14/17	October Quarterly 2017
AMC Esquire 7	\$6.72	8/15/17	October Quarterly 2017
Uber	\$6.22	8/15/17	October Quarterly 2017
Uber	\$1.00	8/15/17	October Quarterly 2017
Charles P. Stanl	\$41.78	8/16/17	October Quarterly 2017
Ol Henry Rest.	\$39.64	8/18/17	October Quarterly 2017
Chipolte	\$27.71	8/21/17	October Quarterly 2017
Starbucks	\$33.08	8/21/17	October Quarterly 2017
Starbucks	\$6.34	8/21/17	October Quarterly 2017
Races On Line TN	\$50.00	8/21/17	October Quarterly 2017
Uber	\$13.08	8/21/17	October Quarterly 2017
Uber	\$3.00	8/21/17	October Quarterly 2017

Uber	\$11.05	8/21/17	October Quarterly 2017
Uber	\$5.00	8/21/17	October Quarterly 2017
Hostgator.com	\$29.95	8/21/17	October Quarterly 2017
Tst*Prtlnd lbs Portland, ME	\$58.24	8/21/17	October Quarterly 2017
Uber	\$5.80	8/21/17	October Quarterly 2017
Uber	\$5.80	8/21/17	October Quarterly 2017
Regions Bank	\$5.00	8/22/17	October Quarterly 2017
Cong Tu Bot	\$45.36	8/22/17	October Quarterly 2017
Uber	\$6.60	8/22/17	October Quarterly 2017
Uber	\$1.00	8/22/17	October Quarterly 2017
Uber	\$6.50	8/22/17	October Quarterly 2017
Uber	\$3.00	8/22/17	October Quarterly 2017
Sonnys Portland, ME	\$25.00	8/23/17	October Quarterly 2017
Ferguson Commun	\$45.00	8/24/17	October Quarterly 2017
Gamlin Whiskey	\$63.47	8/28/17	October Quarterly 2017
J Pfenny's	\$32.06	8/28/17	October Quarterly 2017
United	\$25.00	8/28/17	October Quarterly 2017
Sq*Yellow Cab Austin, TX	\$33.62	8/28/17	October Quarterly 2017
Sq*Anass Gosq Austin, TX	\$18.90	8/28/17	October Quarterly 2017
La Barbaque	\$34.23	8/28/17	October Quarterly 2017
Quickie Pickie	\$5.17	8/28/17	October Quarterly 2017
Uber	\$4.65	8/28/17	October Quarterly 2017
Uber	\$3.00	8/28/17	October Quarterly 2017
Uber	\$5.95	8/28/17	October Quarterly 2017
Uber	\$5.00	8/28/17	October Quarterly 2017
Uber	\$5.95	8/28/17	October Quarterly 2017
Uber	\$5.00	8/28/17	October Quarterly 2017
Lustre Pearl Ra	\$85.00	8/28/17	October Quarterly 2017
Lustre Pearl Ra	\$20.00	8/28/17	October Quarterly 2017
Lambert St. louis	\$66.00	8/28/17	October Quarterly 2017
Uber	\$11.30	8/28/17	October Quarterly 2017
Uber	\$3.00	8/28/17	October Quarterly 2017
Hotel Van Zandt	\$3.25	8/29/17	October Quarterly 2017
Wildflower Rest	\$65.59	8/30/17	October Quarterly 2017
Gamlin Whiskey	\$49.23	9/5/17	October Quarterly 2017
Highlands Golf	\$13.75	9/5/17	October Quarterly 2017
Uber	\$10.08	9/5/17	October Quarterly 2017
Uber	\$3.00	9/5/17	October Quarterly 2017
Uber	\$9.44	9/5/17	October Quarterly 2017
Uber	\$3.00	9/5/17	October Quarterly 2017
USPS	\$9.80	9/6/17	October Quarterly 2017
Starbucks	\$4.83	9/11/17	October Quarterly 2017
Crushed Red	\$17.30	9/11/17	October Quarterly 2017
Starbucks	\$4.82	9/11/17	October Quarterly 2017
Fallons Bar and Grill	\$39.07	9/11/17	October Quarterly 2017

City Park Grill	\$8.00	9/11/17	October Quarterly 2017
City Park Grill	\$30.00	9/11/17	October Quarterly 2017
Uber	\$7.23	9/11/17	October Quarterly 2017
sq* Loufest, LI	\$6.00	9/11/17	October Quarterly 2017
sq* Loufest, LI	\$7.00	9/11/17	October Quarterly 2017
sq* Loufest, LI	\$10.00	9/11/17	October Quarterly 2017
sq* Loufest, LI	\$7.00	9/11/17	October Quarterly 2017
Straubs	\$12.18	9/11/17	October Quarterly 2017
Exxonmobil	\$5.53	9/12/17	October Quarterly 2017
Gamlin Whiskey	\$79.79	9/12/17	October Quarterly 2017
Cityofst louis	\$5.00	9/12/17	October Quarterly 2017
BP#8795221	\$38.57	9/12/17	October Quarterly 2017
Walgreens	\$4.40	9/12/17	October Quarterly 2017
Antons	\$38.09	9/13/17	October Quarterly 2017
Phillips 66	\$33.38	9/13/17	October Quarterly 2017
Phillips 66	\$6.92	9/13/17	October Quarterly 2017
Chipolte	\$7.00	9/13/17	October Quarterly 2017
CallFire	\$2.90	9/14/17	October Quarterly 2017
J Pfenny's	\$30.87	9/14/17	October Quarterly 2017
Spectators	\$33.65	9/14/17	October Quarterly 2017
Phillips 66	\$10.00	9/14/17	October Quarterly 2017
Spectators	\$12.00	9/15/17	October Quarterly 2017
Straubs	\$15.74	9/15/17	October Quarterly 2017
Straubs	\$2.12	9/15/17	October Quarterly 2017
Sybergs Arnold	\$35.03	9/18/17	October Quarterly 2017
Gamlin Whiskey	\$63.47	9/18/17	October Quarterly 2017
The BBQ Saloon	\$24.57	9/18/17	October Quarterly 2017
Wingstop	\$34.14	9/18/17	October Quarterly 2017
Venmo	\$75.00	9/18/17	October Quarterly 2017
Uber	\$10.59	9/18/17	October Quarterly 2017
Uber	\$5.00	9/18/17	October Quarterly 2017
sq* family food	\$14.00	9/18/17	October Quarterly 2017
Eckert	\$28.85	9/18/17	October Quarterly 2017
Circle K	\$20.01	9/18/17	October Quarterly 2017
St. Louis Bread	\$7.70	9/19/17	October Quarterly 2017
Regions Bank	\$5.00	9/20/17	October Quarterly 2017
Hostgator.com	\$29.95	9/20/17	October Quarterly 2017
Uber	\$6.53	9/21/17	October Quarterly 2017
Uber	\$3.00	9/21/17	October Quarterly 2017
Uber	\$3.87	9/21/17	October Quarterly 2017
Uber	\$15.05	9/21/17	October Quarterly 2017
Uber	\$3.00	9/21/17	October Quarterly 2017
Uber	\$8.31	9/21/17	October Quarterly 2017
Sq* Vip Cab	\$8.19	9/21/17	October Quarterly 2017
Uber	\$3.00	9/21/17	October Quarterly 2017

Uber	\$7.92	9/21/17	October Quarterly 2017
Uber	\$3.00	9/21/17	October Quarterly 2017
Uber	\$10.72	9/21/17	October Quarterly 2017
Uber	\$5.00	9/21/17	October Quarterly 2017
United	\$25.00	9/22/17	October Quarterly 2017
Dunkin Donuts	\$4.65	9/22/17	October Quarterly 2017
Supershuttle Ex	\$68.08	9/22/17	October Quarterly 2017
Busboys & Poets	\$57.30	9/22/17	October Quarterly 2017
Uber	\$7.90	9/22/17	October Quarterly 2017
Uber	\$3.00	9/22/17	October Quarterly 2017
Uber	\$4.84	9/22/17	October Quarterly 2017
Uber	\$3.00	9/22/17	October Quarterly 2017
Uber	\$26.11	9/22/17	October Quarterly 2017
Uber	\$5.00	9/22/17	October Quarterly 2017
Uber	\$8.59	9/22/17	October Quarterly 2017
City Tap 901 DC	\$43.40	9/25/17	October Quarterly 2017
Sq* uvs Gosq.CO	\$8.36	9/25/17	October Quarterly 2017
City Tap 901 DC	\$22.80	9/25/17	October Quarterly 2017
Uber	\$7.90	9/25/17	October Quarterly 2017
Uber	\$5.00	9/25/17	October Quarterly 2017
Uber	\$10.53	9/25/17	October Quarterly 2017
Uber	\$6.62	9/25/17	October Quarterly 2017
Uber	\$5.67	9/25/17	October Quarterly 2017
Uber	\$12.29	9/25/17	October Quarterly 2017
Uber	\$11.14	9/25/17	October Quarterly 2017
Tst*Mgr Restaur	\$46.70	9/25/17	October Quarterly 2017
Topgolf Loudoun	\$13.25	9/25/17	October Quarterly 2017
Co Co Sala	\$97.40	9/25/17	October Quarterly 2017
Uber	\$43.34	9/25/17	October Quarterly 2017
Washington DC C	\$8.25	9/26/17	October Quarterly 2017
United	\$25.00	9/26/17	October Quarterly 2017
Café Piazza	\$28.91	9/27/17	October Quarterly 2017
The Royale FoodSq*ed S Trophi	\$16.12	9/27/17	October Quarterly 2017
Voodoo Saint Lo	\$21.96	10/2/17	January Quarterly 2018
Dunklin Citgo	\$12.67	10/2/17	January Quarterly 2018
Regions Bank	\$2.50	10/3/17	January Quarterly 2018
Regions Bank	\$2.50	10/3/17	January Quarterly 2018
The BBQ Saloon	\$55.00	10/3/17	January Quarterly 2018
Cash withdrawal	\$43.00	10/3/17	January Quarterly 2018
Cash withdrawal	\$43.00	10/3/17	January Quarterly 2018
Starbucks	\$2.99	10/4/17	January Quarterly 2018
Domino	\$20.41	10/4/17	January Quarterly 2018
El Burro Loco	\$21.35	10/4/17	January Quarterly 2018
Apl*Itunes	\$9.99	10/5/17	January Quarterly 2018
Lyft	\$7.60	10/5/17	January Quarterly 2018

Lyft	\$1.87	10/5/17	January Quarterly 2018
Lyft	\$5.00	10/5/17	January Quarterly 2018
Sq *ed uvc	\$17.03	10/5/17	January Quarterly 2018
United	\$60.00	10/6/17	January Quarterly 2018
Lyft	\$2.93	10/6/17	January Quarterly 2018
Art and Soul at	\$31.85	10/10/17	January Quarterly 2018
The Alibi	\$48.50	10/10/17	January Quarterly 2018
Manny and Olga	\$20.08	10/10/17	January Quarterly 2018
Lyft	\$7.03	10/10/17	January Quarterly 2018
Beuchert s Salo	\$44.65	10/10/17	January Quarterly 2018
Lyft	\$9.39	10/10/17	January Quarterly 2018
Lyft	\$7.42	10/10/17	January Quarterly 2018
Lyft	\$5.05	10/10/17	January Quarterly 2018
Manny and Olga	\$20.85	10/10/17	January Quarterly 2018
Lyft	\$12.71	10/10/17	January Quarterly 2018
Republic	\$87.74	10/10/17	January Quarterly 2018
Lyft	\$13.91	10/10/17	January Quarterly 2018
W Wash DC Dinin	\$51.80	10/10/17	January Quarterly 2018
The Hamilton	\$61.15	10/10/17	January Quarterly 2018
Lyft	\$2.00	10/10/17	January Quarterly 2018
Lyft	\$6.22	10/10/17	January Quarterly 2018
The Mintwood Pl	\$79.30	10/10/17	January Quarterly 2018
Eighteenth Stree	\$21.00	10/10/17	January Quarterly 2018
City Tap House	\$19.40	10/10/17	January Quarterly 2018
Uber	\$9.10	10/10/17	January Quarterly 2018
Uber	\$5.00	10/10/17	January Quarterly 2018
Lyft	\$3.55	10/10/17	January Quarterly 2018
District Kitchen	\$23.20	10/10/17	January Quarterly 2018
Lyft	\$1.45	10/10/17	January Quarterly 2018
Lyft	\$2.00	10/10/17	January Quarterly 2018
The Marquee	\$6.95	10/10/17	January Quarterly 2018
Lyft	\$4.66	10/10/17	January Quarterly 2018
Lyft	\$3.87	10/10/17	January Quarterly 2018
Lyft	\$4.13	10/10/17	January Quarterly 2018
Lyft	\$8.92	10/10/17	January Quarterly 2018
Regions Bank	\$2.50	10/11/17	January Quarterly 2018
Morsels Omni Sh	\$11.28	10/11/17	January Quarterly 2018
Morsels Omni Sh	\$3.30	10/11/17	January Quarterly 2018
Lyft	\$3.45	10/11/17	January Quarterly 2018
Marvin Restaurant	\$3.00	10/11/17	January Quarterly 2018
Lyft	\$7.07	10/11/17	January Quarterly 2018
Lyft	\$2.11	10/11/17	January Quarterly 2018
Cash withdrawal	\$23.50	10/11/17	January Quarterly 2018
Lyft	\$10.13	10/12/17	January Quarterly 2018
The Hamilton	\$64.90	10/12/17	January Quarterly 2018

Lyft	\$13.34	10/12/17	January Quarterly 2018
Medaterra	\$32.10	10/12/17	January Quarterly 2018
Chipolte	\$22.75	10/12/17	January Quarterly 2018
Omni Shoreham	\$76.75	10/13/17	January Quarterly 2018
Omni Shoreham	\$47.60	10/13/17	January Quarterly 2018
Morsels Omni Sh	\$3.30	10/13/17	January Quarterly 2018
Lyft	\$20.70	10/13/17	January Quarterly 2018
United	\$60.00	10/13/17	January Quarterly 2018
Taxi svc	\$8.48	10/13/17	January Quarterly 2018
Thai 202	\$13.42	10/13/17	January Quarterly 2018
Uber	\$5.85	10/13/17	January Quarterly 2018
CallFire	\$3.00	10/16/17	January Quarterly 2018
Starbucks	\$4.97	10/16/17	January Quarterly 2018
Exxonmobil	\$35.67	10/16/17	January Quarterly 2018
El Burro Loco	\$33.57	10/16/17	January Quarterly 2018
The BBQ Saloon	\$26.68	10/16/17	January Quarterly 2018
Drakes Place	\$16.58	10/16/17	January Quarterly 2018
Marriot STL	\$3.00	10/16/17	January Quarterly 2018
Lyft	\$9.73	10/16/17	January Quarterly 2018
Lyft	\$2.00	10/16/17	January Quarterly 2018
Name-Cheap	\$22.99	10/17/17	January Quarterly 2018
Withrop Rockefeller Institute, Morrilton, AR	\$64.50	10/18/17	January Quarterly 2018
Ua Infit	\$4.59	10/18/17	January Quarterly 2018
Lyft	\$6.10	10/18/17	January Quarterly 2018
Straubs	\$6.19	10/18/17	January Quarterly 2018
Lyft	\$6.10	10/19/17	January Quarterly 2018
The Capital Hotel Little Rock, AR	\$20.00	10/19/17	January Quarterly 2018
The Capital Hotel Little Rock, AR	\$20.00	10/19/17	January Quarterly 2018
Regions Bank	\$5.00	10/20/17	January Quarterly 2018
Taxi svc	\$12.90	10/20/17	January Quarterly 2018
Hostgator.com	\$29.95	10/20/17	January Quarterly 2018
Kingside diner	\$45.97	10/20/17	January Quarterly 2018
Smoothie King	\$21.37	10/20/17	January Quarterly 2018
Starbucks	\$4.97	10/23/17	January Quarterly 2018
Highland Golf	\$14.00	10/23/17	January Quarterly 2018
Gamlin Whiskey	\$65.84	10/23/17	January Quarterly 2018
Regions Bank	\$2.50	10/23/17	January Quarterly 2018
Regions Bank	\$36.00	11/13/17	January Quarterly 2018
Hostgator.com	\$29.95	11/20/17	January Quarterly 2018
Hostgator.com	\$29.95	12/20/17	January Quarterly 2018
Hostgator.com	\$29.95	1/22/18	April Quarterly 2018
Hostgator.com	\$29.95	2/20/18	April Quarterly 2018
Hostgator.com	\$29.95	3/20/18	April Quarterly 2018
Total	\$16,065.64		

Attachment 2.

Expenditure Name	Amount	Date	Report Not Showing Expenditure
Masa 14	\$136.15	8/29/16	October Quarterly 2016
El Centro D.F.	\$140.20	8/29/16	October Quarterly 2016
United	\$111.10	8/30/16	October Quarterly 2016
Facebook	\$179.25	9/1/16	October Quarterly 2016
Sqc*tearrance A	\$1,200.00	9/2/16	October Quarterly 2016
Bestbuy.com	\$753.03	9/6/16	October Quarterly 2016
Sub Zero Vodka	\$157.65	9/8/16	October Quarterly 2016
Ginosi Aparteis	\$951.26	9/14/16	October Quarterly 2016
J Pfenny's	\$122.11	9/15/16	October Quarterly 2016
Nationbuilder	\$259.00	9/19/16	October Quarterly 2016
Lafayette Hotel New Orleans	\$208.19	9/22/16	October Quarterly 2016
Lafayette Hotel New Orleans	\$393.39	9/26/16	October Quarterly 2016
ATT Payment	\$122.26	10/12/16	8 Day Before General Election 11/8/16
Laclede Gas	\$141.60	10/19/16	8 Day Before General Election 11/8/16
Charter Communications	\$180.40	10/25/16	8 Day Before General Election 11/8/16
ATT Payment	\$140.19	11/8/16	30 Day After General Election 11/8/16
ATT Payment	\$140.19	12/6/16	April Quarterly 2017
ATT Payment	\$145.19	1/9/17	April Quarterly 2017
Dillards	\$162.53	1/9/17	April Quarterly 2017
Charter Communic	\$203.92	1/30/17	April Quarterly 2017
Nationbuilder	\$259.00	2/2/17	April Quarterly 2017
Riversong Spa	\$149.55	2/3/17	April Quarterly 2017
Furniture Factory	\$491.23	2/6/17	April Quarterly 2017
ATM withdrawal	\$100.00	2/8/17	April Quarterly 2017
ATT Payment	\$145.15	2/14/17	April Quarterly 2017
Macys Galleria	\$108.59	2/15/17	April Quarterly 2017
Boogaloo	\$110.64	2/16/17	April Quarterly 2017
ATM withdrawal One Ameristar	\$400.00	2/21/17	April Quarterly 2017
Mediacom	\$121.95	2/23/17	April Quarterly 2017
Louis Erby	\$500.00	2/20/17	April Quarterly 2017
ATM withdrawal Ameristar	\$200.00	3/3/17	April Quarterly 2017
ATM withdrawal Ameristar	\$200.00	3/6/17	April Quarterly 2017
ATT Payment	\$178.35	3/8/17	April Quarterly 2017
Expedia	\$192.63	3/13/17	April Quarterly 2017
Spectators	\$130.75	3/17/17	April Quarterly 2017

Paypal * electte	\$250.00	3/30/17	April Quarterly 2017
Ferguson Youth Initiative	\$150.00	4/3/17	July Quarterly 2017
Ferguson Youth Initiative	\$200.00	4/3/17	July Quarterly 2017
Tiger Towing	\$145.00	4/3/17	July Quarterly 2017
The Tiger Hotel	\$364.85	4/4/17	July Quarterly 2017
The Tiger Hotel	\$497.26	4/4/17	July Quarterly 2017
ATT Payment	\$162.24	4/10/17	July Quarterly 2017
Spectators	\$195.00	4/14/17	July Quarterly 2017
Tavern Kitchen	\$126.97	4/17/17	July Quarterly 2017
Venmo	\$120.00	4/21/17	July Quarterly 2017
J Pfenny's	\$110.50	4/24/17	July Quarterly 2017
ATT Payment	\$234.54	5/9/17	July Quarterly 2017
The Grand Café	\$104.61	5/11/17	July Quarterly 2017
Expedia	\$507.62	5/18/17	July Quarterly 2017
Spectators	\$107.10	5/24/17	July Quarterly 2017
Westin Kansas	\$541.13	5/30/17	July Quarterly 2017
Holiday Inn	\$325.88	6/6/17	July Quarterly 2017
ATT Payment	\$217.02	6/8/17	July Quarterly 2017
Courtyard	\$190.65	6/20/17	July Quarterly 2017
Circa at Foggy	\$185.60	7/10/17	October Quarterly 2017
Café Saint - Ex	\$115.70	7/11/17	October Quarterly 2017
ATT Payment	\$158.92	7/11/17	October Quarterly 2017
Sportssprint	\$194.80	7/28/17	October Quarterly 2017
Evangeline	\$119.93	8/3/17	October Quarterly 2017
ATT Payment	\$322.44	8/8/17	October Quarterly 2017
act*national BI	\$108.90	8/18/17	October Quarterly 2017
Hotel Van Zandt	\$484.60	8/29/17	October Quarterly 2017
ATT Payment	\$240.66	9/6/17	October Quarterly 2017
Priceline*air	\$317.24	9/19/17	October Quarterly 2017
Congressional B	\$135.00	9/22/17	October Quarterly 2017
The Hamilton	\$177.44	9/25/17	October Quarterly 2017
The Liaison Cap	\$161.86	9/26/17	October Quarterly 2017
Sq*ed S Trophi	\$175.00	9/27/17	October Quarterly 2017
Priceline*air	\$323.58	10/2/17	January Quarterly 2018
Hoteltonightthe	\$745.00	10/5/17	January Quarterly 2018
Bar Dupont	\$121.20	10/6/17	January Quarterly 2018
Sq *ed Trophi	\$120.55	10/6/17	January Quarterly 2018
ATT Payment	\$235.66	10/6/17	January Quarterly 2018
Lost Society	\$220.00	10/10/17	January Quarterly 2018
Washington Court Hotel	\$251.07	10/11/17	January Quarterly 2018
Expedia	\$106.01	10/17/17	January Quarterly 2018
Priceline*air	\$323.74	10/18/17	January Quarterly 2018
Arbor Village	\$560.00	11/5/17	January Quarterly 2018
Total	\$19,590.72		

ORDER

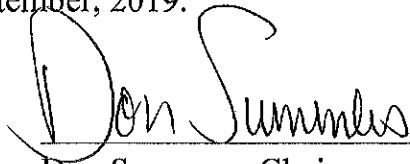
The Missouri Ethics Commission finds probable cause that Respondents Courtney Curtis and his candidate committee Curtis for MO violated, and has knowingly violated, Sections 130.021.2, 130.021.4(1), 130.021.5, 130.021.7, 130.031.2, 130.034, 130.036.1, 130.036.8, 130.041.1(3), 130.041.1(4), 130.044.1, 130.046.1 and 130.046.5(2), RSMo.

1. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
2. Respondents shall file and amend all reports and statements pertaining to this Order and the Order filed on July 14, 2017 pertaining to Case No.15-0006-A.
3. Respondents shall disclose the existence of all bank accounts that have been and currently are associated with any committee that is registered with the Missouri Ethics Commission.
4. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$77,500.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$7,750.00 of that fee within forty-five days after the date of the Order, and if Respondents comply with conditions detailed in paragraphs 2 and 3, and if Respondents pay the outstanding fee from Case No. 15-0006-A, then the remainder of the fee will be stayed. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.
5. Regardless of the stay in paragraph 4 above, if there is probable cause to believe that any Respondent has committed any further violation of the campaign finance laws under Chapter 130, RSMo, within the two-year period from the date of this order, then the Respondent who committed the violation will be required to pay the

remainder of the fee. The fee will be due immediately upon final adjudication finding that there is probable cause to believe that such Respondent has committed such a violation.

6. Respondents shall be jointly and severally liable for all fees imposed under this Order.

SO ORDERED, this 24th day of September, 2019.



Don Summers, Chair